

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Cause no. 4:15CR545 CEJ/NAB
)	
EUGENE DOKES,)	
)	
Defendant.)	

MOTION FOR LEAVE TO TRAVEL
FOR PLEA HEARING AND WORK PURPOSES

COMES NOW, Defendant, by and through counsel, and requests that this court grant him leave to travel to from Sacramento to St. Louis for his plea hearing and then to New Orleans for an all staff meeting, and in support thereof states as follows:

1. Defendant's plea has been set on June 23, 2016 at 1:30 p.m. [DOC 45];
2. Defendant, his wife Kenyota Dokes and their three children plan to drive from Sacramento to St. Louis on June 20, 2016 and arrive in St. Louis on June 22, 2016;
3. Defendant will spend the night on June 22, 2016 at the Doubletree Hotel located at 16625 Swingley Ridge Road, Chesterfield, MO 63107. See reservation information at Exhibit A;
4. Defendant will leave from St. Louis on June 23, 2016 and drive to New Orleans overnight;
5. While in New Orleans, Defendant will stay at St. James Hotel located at 330

Magazine St, New Orleans, LA 70130 with his Time Share Company from June 24, 2016 to June 26, 2016. See reservation information at Exhibit B;

6. On June 27, 2016, Defendant will check-in to the Hilton New Orleans Riverside located at Two Poydras Street, New Orleans, Louisiana 70130. See reservation information at Exhibit C. This hotel is the location of the all staff meeting Defendant will be attending for his job;
7. The ALL ROD (Retailer Operation Division) Meeting is scheduled from June 27, 2016 through June 30, 2016 . Registration begins on June 27, 2016, the meeting begins on June 28, 2016 and ends on June 30, 2016. See meeting information at Exhibit D;
8. On June 1, 2016, Defendant will begin the drive back to Sacramento. Defendant plans to drive for approximately 8 hours during daylight and sleep in hotels at night.
9. Defendant anticipates arriving in Dallas, Texas by approximately 9:00 p.m. on July 1, 2016. Defendant booked at room at the Embassy Suites located at 14021 Noel Road, Dallas, Texas, 75240. See reservation information at Exhibit E. On the morning of July 2, 2016, Defendant will begin the last leg of the drive back to Sacramento. Defendant estimates they will arrive on July 4, 2016 if they take regularly scheduled stops;
10. If during Defendant's travels, he determines their itinerary will need to be adjusted, he will contact his pretrial officer Shae Rucker and notify him of any changes in their schedule. Defendant emailed Mr. Rucker his travel plans on June

13, 2016. See Exhibit F.

WHEREFORE, defendant requests that this court grant him leave to travel to from Sacramento to St. Louis for his plea hearing and then to New Orleans for an all staff meeting.

Respectfully Submitted,

SINDEL, SINDEL, & NOBLE, P.C.

/s/ Richard H. Sindel
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of June, 2016, a copy of the foregoing **MOTION FOR LEAVE TO TRAVEL FOR PLEA HEARING AND WORK PURPOSES** was sent via the court's electronic filing system to be served on all attorneys of record.

/s/ Richard H. Sindel